

# *Delgado* Communications

February 23<sup>rd</sup>, 2009

**Via ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: Delgado Communications, Inc. (Form 499 Filer Id 822146)  
2008 CPNI Compliance Certification  
EB Docket No. 06-36**

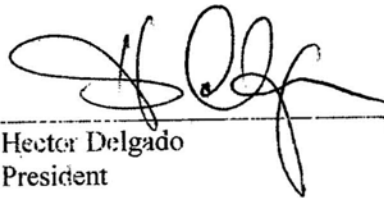
Dear Ms. Dortch:

On behalf of Delgado Communications, Inc., and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's 2008 CPNI Certification.

Delgado is filing this CPNI certification out of an abundance of caution and maintains its position that it likely does not need to file this CPNI compliance certification because it is not a "telecommunications carrier" but rather a "call shop" equivalent to a payphone facility. However, as a precautionary measure, Delgado hereby submits this CPNI compliance certification as it is nonetheless in compliance with the FCC's CPNI rules.

Should you have any questions about the foregoing, please contact the undersigned.

Respectfully Submitted,

  
\_\_\_\_\_  
Hector Delgado  
President

Enclosure

cc: Best Copy and Printing, Inc. (FCC@BCPIWEB.COM)

# *Delgado* Communications

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company(s) covered by this certification: Delgado Communications, Inc.

Form 499 Filer ID: 822146

Name of signatory: Hector Delgado

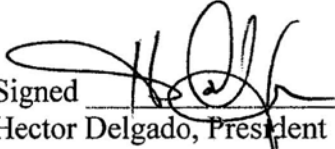
Title of signatory: President

I, Hector Delgado, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed   
Hector Delgado, President  
Delgado Communications, Inc.



**DELGADO COMMUNICATIONS, INC.**

**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

Delgado Communications, Inc. (the "Company" or "Delgado") has a policy of protecting CPNI in a manner consistent with the FCC's policies to protect CPNI from disclosure or unauthorized use.

As an initial matter, due to the anonymous nature of its business, Delgado never comes into contact with any customer service records, billing records or call detail records on an individually attributable basis. None of the calls made from or received at one of Delgado's call centers can be traced to a specific customer. Thus, Delgado does not, and cannot, share, sell, lease and otherwise provide CPNI to any of its affiliates, suppliers, vendors and any other third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties is prohibited by the Company and the Company has no plans to ever share this information with unrelated third parties. To the extent that any information Delgado ever receives could be considered CPNI, it would only use the information in a manner permitted by law such as to collect for services rendered; to protect rights or property of the Company, other users or other carriers from unlawful use; and to provide any administrative services for the duration of a call.

Delgado does not conduct any marketing of its communications services. Thus, Delgado does not use CPNI for any marketing purposes. Therefore, Delgado does not collect opt-in or opt-out authorizations from customers for such use. Delgado makes no marketing contact with its customers. As such, the provisions related to customer notice, maintaining records of customer authorizations and informing the Commission of any failure of a method to opt-out are not applicable.

Employees are trained on the FCC regulations including CPNI requirements. Any employee who by some means comes into contact with CPNI and violates Delgado's policies regarding access to this information is subject to discipline, up to and including termination of employment. All employees are informed of this policy.

The Company has not taken any actions against data brokers in the past year. Nor has the Company received any customer complaints in the past year concerning the unauthorized release of CPNI.